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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-0086JMS
)	CR. NO. 05-0102JMS
Plaintiff,)	
)	MOTION FOR DEPARTURE DOWNWARD
VS.)	IN SENTENCING DEFENDANT
)	
JOHN HYUN CAMP,)	Sentencing date: 3/28/06 at
)	2:15 p.m., before the Hon.
Defendant.)	J. Michael Seabright, U.S.
)	District Judge

MOTION FOR DOWNWARD DEPARTURE
IN SENTENCING DEFENDANT

The United States of America, by and through its undersigned counsel, hereby moves this Honorable Court to depart downwards in imposing sentence upon defendant above-named, due to his substantial assistance to and cooperation with law enforcement authorities in the investigation or prosecution of other persons who have committed an offense.

This motion is made pursuant to 18 U.S.C. 3553(e) and U.S. Sentencing Commission Guideline 5K1.1, and is based upon the

information contained in the sealed "Factual Basis for Motion for Departure Downward in Sentencing Defendant", filed concurrently herewith.

DATED: Honolulu, Hawaii, March 21, 2006.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Michael K. Kawahara
MICHAEL K. KAWAHARA
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served Electronically through CM/ECF:

Brook Hart, Esq. hartlaw@hawaii.rr.com March 21, 2006

Attorney for defendant
John Hyun Camp

Served by hand-delivery:

Probation Officer March 21, 2006
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Box 50111, Rm. C-126
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/s/ Rowena N. Kang